

TITLE 326 AIR POLLUTION CONTROL BOARD

LSA Document #04-279

SUMMARY/RESPONSE TO COMMENTS FROM THE SECOND COMMENT PERIOD

The Indiana Department of Environmental Management (IDEM) requested public comment from October 1, 2005, through November 3, 2005, on IDEM's draft rule language. IDEM received comments from the following parties:

Indiana Furniture Industries (IFI)
University of Notre Dame (UND)
International Steel Group (ISG)
Automotive Components Holdings LLC (ACH)
SCA Tissue North America LLC (SCA)
International Truck and Engine Corporation (ITE)
BP Products North America-Whiting (BP)
Ispat Inland Inc.(ISG Burns Harbor/Mittal Steel) (Ispat)

Following is a summary of the comments received and IDEM's responses thereto.

Comment: Merge 326 IAC 6.5-4-8 and 326 IAC 6.5-4-10, Indiana Dimension into one rule section with the name Indiana Dimension, Indiana Furniture Industries. Add Point Input ID "254", Process "Wood Working-Dust Collector" and tons/yr ".4" to 326 IAC 6.5-4-10. (IFI)

Response: IDEM proposes to update the source identification at 326 IAC 6.5-4-10 to "Indiana Dimension, Indiana Furniture Industries", and to move the process and emission limits at 326 IAC 6.5-4-8 to 326 IAC 6.5-4-10, and to repeal 326 IAC 6.5-4-8.

Comment: In 326 IAC 6.5-4-9, Indiana Desk Company, change the point input ID from "107" to "102" and add "dust collector" after "Wood Working". (IFI)

Response: IDEM proposes to change the point input ID from "107" to "102" and add "dust collector" after "Wood Working".

Comment: In 326 IAC 6.5-4-11, Indiana Furniture Industries/Indiana Dimension, Boiler 7 has been taken out of production and the stack has been torn down. Please repeal this section of the rule. (IFI)

Response: IDEM proposes to repeal 326 IAC 6.5-4-11.

Comment: At 326 IAC 6.5-6-15, please change the name of the rule section from Ford Motor Co. to Automotive Components Holdings LLC-Indianapolis Plant. (ACH)

Response: IDEM proposes the name change.

Comment: At 326 IAC 6.5-6-26 International Truck and Engine, add “& Indianapolis Casting Corporation” as part of the source’s name. Change Point Input ID’s as suggested. Delete out of date requirements in subsection (b)(1) and (b)(2) and add “except natural gas” to subdivision (3)(A) to specify which boilers require written reports. (ITE)

Response: IDEM proposes the requested amendments and will add the phrase “except if natural gas is burned” under section 3(b)(1)(A).

Comment: In 326 IAC 6.5-7-16, University of Notre Dame du Lac, for point input ID 14P at Boiler No. 2 and 3, add “and Gas” after “coal”. At Point Input ID 15P, after “Gas” reinstate “and Coal” that was printed as stricken in the Notice of Second Comment Period. (UND)

Response: IDEM proposes the requested amendments.

Comment: At 326 IAC 6.8-2-6, BP Products North America, delete “number 1, F201, and F 202” and add “A” after “F-102”, change the emission limit from “0.290” to “0.240”. (BP)

Response: IDEM proposes to delete “number 1, F201, and F 202” and add “A”: after “F-102” and proposes to change the emission limit for “F-102” from “0.290” to “0.447” not “0.240” as requested in the comment dated November 3, 2005. Additionally IDEM proposes to change the “lb/MMBtu” limit from “0.004” to “0.0075”.

Since second notice, the department has worked with BP to determine the appropriate limits for sources at BP. Emission limits have been changed for 32 sources; there were 23 increases and 9 decreases. Additionally, 12 sources no longer exist.

Overall the emission limits for this source are being updated to reflect the shut down of certain units at BP Whiting, the cessation of fuel oil combustion (emissions decrease) and uncertainty with respect to the use of AP-42 emission factors to demonstrate compliance with the combustion of natural gas and refinery gas.

The rule is being amended to change the emission limit to 0.0075 lb/MMBtu for units burning natural gas and refinery gas. This new limit is based on the emission factor for natural gas combustion that includes filterable and condensible particulate matter (PM) emissions. Although there are no actual emission increases, the emission limit is increasing to reflect both filterable and condensible PM₁₀ emissions so that BP can use emission factors or test methods based on both portions of PM to demonstrate compliance.

Comment: At 326 IAC 6.8-2-6, delete boiler numbers “1, 2,” and change the emission limit from “15.809” to “8.48”. (BP)

Response: Since boilers 1 through 4 are now shut down, IDEM will propose to strike the emission limits for the stack serving number 1 power station boiler numbers 1, 2, 3, and 4.

Comment: At 326 IAC 6.8-2-6, delete “and 8” and change the emission limit from “13.244” to “12.72”. (BP)

Response: IDEM proposes to “delete 8” and change the emission limit for “stack serving

number 1 power station, boiler numbers 5, 6, and 7” from “13.244” to “5.924”, not “12.72” as requested by BP, based on additional comments received from the source on June 4, 2007.

Comment: At 326 IAC 6.8-2-6, add “F-801 A/B” to the Cat feed hydro treating unit. (BP)

Response: IDEM proposes to add “F-801 A/B” to the cat feed hydro treating unit.

Comment: At 326 IAC 6.8-2-6, delete “Berry Lake distillate” and add “asphalt” to “F-1 heater”. (BP)

Response: IDEM proposes to delete “Berry Lake distillate” and add “Asphalt” to the F-1 heater.

Comment: At 326 IAC 6.8-2-6, delete “(B/S)” after “Stretford” as requested at second notice, add “(B/S T.U.)” after “Unit”, delete “(new)”, and add “of feed” to column number 2. (BP)

Response: At first notice BP requested that “Beavon Stretford (B/S) be added as a description to “tail gas unit (new)” which IDEM did and was reflected in draft rule language that was published with the second notice. At second notice, BP requested that the language “B/S”, added in response to the first notice, be deleted. BP’s second notice comments requested that “B/S TGU” be added after “tail gas unit” and that “new” be deleted. Additionally, BP requested that IDEM add “of feed” to the 0.1100 lb/ton limit.

Comment: At 326 IAC 6.8-2-11, change the name of the rule section from “Georgia Pacific” to “SCA Tissue NA LLC”. Also change the emission limit (Units) to 0.44 lb/MMBtu which is consistent with our federally enforceable state operating permit (FESOP). (SCA)

Response: IDEM proposes to change the name of the rule section from “Georgia Pacific” to “SCA Tissue NA LLC” and to change the emission limit to “0.44 lb/MMBtu”.

Comment: At 326 IAC 6.8-2-17, ISG Burns Harbor LLC/ Mittal Steel USA, amend the rule as follows:

- Number 7 ~~blast furnace canopy~~ **blast furnace casthouse (west)** baghouse.
- Number 7 blast furnace casthouse (**east**) baghouse.
- Number 4 basic oxygen furnace reladling and desulfurization ~~baghouse~~ **baghouses**.
- Raw** coal conveyor transfer baghouse A.
- Raw** coal storage bin baghouse C.

Strike “Blending system baghouse B” limits in 326 IAC 6.8-2-17, because the baghouse was never constructed. Section 326 IAC 6.8-7-5(9) is an irrelevant section since it lists limits that were only applicable until December 31, 1994. Please remove the entire section rather than just the selected stacks. Also delete 326 IAC 6.8-9-3(b) because it references limits only applicable until December 31, 1994. (Ispat)

Response: IDEM proposes the requested changes.

Comment: Amend 326 IAC 6.8-2-21(d) for International Steel Group by deleting “Sheet mill number 3 open coil annealing furnace numbers 1 through 3” and “Sheet mill number 2, annealing and galvanizing furnace numbers 2 through 5”. These sources no longer operate at this facility and should be removed from the SIP. Also, to avoid confusion, new language is provided to more clearly identify the two (2) galvanizer furnaces and the two (2) flame furnaces located at Number 2 Sheet Mill. (ISG)

Response: IDEM proposes to delete “Sheet mill number 3 open coil annealing furnace numbers 1 through 3” and “Sheet mill number 2, annealing and galvanizing furnace numbers 2 through 5” from 326 IAC 6.8-6-12 (moved to 326 IAC 6.8-2-21). Additionally, IDEM proposes amendments for the number 2 and number 3 sheet mills and proposes to delete the emission limits because these sources burn only natural gas. This part of the rule is reformatted as requested by the source and IDEM has added “Single stack batch” before “annealing” at (A) and “Four stack batch” before “annealing” at (B) as described in the permit for this source.

Number 3 Sheet Mill:

- (A) Single stack batch annealing furnace numbers 1 through 7
- (B) Four stack batch annealing furnace numbers 1 through 11

Number 2 Sheet Mill, No. 1 and No. 2 galvanize lines:

- (A) Galvanizer furnaces (one (1) per line)
- (B) Flame Furnaces (one (1) per line)